

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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	:	Index No. 610872/2020
<b>RAHUL MANCHANDA</b>	:	
	:	
Plaintiff,	:	
	:	
-against-	:	<b>DECLARATION OF</b>
	:	<b>JOHN P. FAZZIO</b>
	:	
<b>NAVIENT STUDENT LOANS &amp;</b>	:	
<b>EDUCATIONAL CREDIT MANAGEMENT</b>	:	
<b>CORPORATION ("ECMC"),</b>	:	
	:	
	:	
Defendant.	:	
	:	
-----X		

STATE OF NEW YORK     )  
                                  )     ss.:  
COUNTY OF NEW YORK    )

**DECLARATION OF JOHN P. FAZZIO**

I, John P. Fazzio, under penalty of perjury, and pursuant to 38 U.S.C. § 1746, declare as follows:

1. I am a member in good standing with the New York Bar and I represent the Plaintiff, Rahul Manchanda, in this action. I make this declaration in Support of Plaintiff's Motion for Summary Judgment.

2. The documents Bates Stamped as No.(s) 000001-000115 reflect the discovery provided to Plaintiff by Defendant and the attached copies are true and accurate copies of the original production, attached hereto as **Exhibit A**.

3. A true and accurate copy of the Deposition Transcript of Mithun Sarang dated March 20, 2021, comprising of 116 pages is attached hereto as **Exhibit B**.

4. A true and accurate copy of the audio recording of Mr. Sarang is attached hereto as **Exhibit C**. A non-certified Word Transcription from Sonix is attached in Word Format, but a

more formal certified transcript will follow if the authenticity and correctness of the transcription is challenged. This firm was only retained on this matter three (3) days ago and there was insufficient time to commission a certified transcript.

5. A true and accurate copy of the Proof of Claim by ASA in Plaintiff's Bankruptcy Filing is attached hereto as **Exhibit D.**

6. A true and accurate copy of the full FFELP Promissory Note is attached hereto as **Exhibit E.**

7. A true and accurate copy of the New York Times Article on Ruthless Debt Collection cited in the 56.1 Statement and Memorandum of Law is attached hereto as **Exhibit F.**

8. I certify that the foregoing statements made by me are true to the best of my knowledge, information, and belief. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

/s/ John P. Fazzio, Esq.  
John P. Fazzio, Esq.  
**FAZZIO LAW OFFICES**  
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Dated: May 25, 2021  
New York, NY